

From: Weaver, Kyle Kyle.Weaver@mahouse.gov ■
Subject: FW: Arkwood, Inc. - Congressional Inquiry on Superfund Site in Boone County, Arkansas
Date: September 17, 2013 at 10:25 AM
To: CC Grisham grish@me.com

WK

Curt,

I am providing for your record the initial congressional inquiry I filed today with my congressional liaison at EPA Region 6. (see below) Please note that you should continue to use your established channel of communication with EPA Region 6, as my contact is for congressional affairs only. However, I wanted to ensure you had a copy of what I sent so you know I started my end of the process. Also, I included the other individuals you have contacted in Rep. Crawford's office, Sen. Pryor's office and in the Governor's office on my email so we are all aware of the inquiry I made. Additionally, I would note that I have included Rep. Griffin's office as I saw the address on your general authorization form was in Van Buren County, which is in Congressman Griffin's district making you his constituent.

Please note that I realize your issues with this entire process extend beyond the scope of my initial inquiry. My intent with this inquiry was to specifically focus on the aspects of the issue pertaining to delisting from the NPL and returning to a productive use.

Kyle Weaver | *Projects Director*
Congressman Steve Womack, AR-3

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From: Weaver, Kyle
Sent: Tuesday, September 17, 2013 12:16 PM
To: 'Thomas, LaWanda'
Cc: 'Hall, Russell (Pryor)'; Vogelpohl, Carl; Sherrod, Jay; 'tim.gauger@arkansas.gov'
Subject: Arkwood, Inc. - Congressional Inquiry on Superfund Site in Boone County, Arkansas
Importance: High

Ms. Thomas,

Last week, I was contacted by a Mr. CC "Curt" Grisham, Jr., of Shirley, Arkansas, about EPA Superfund Site Arkwood, Inc., in Boone County, Arkansas. (EPA ID# ARD084930148; Site ID: 0600124). Mr. Grisham related a number of concerns about the progress being made to remediate the Arkwood site so it can be eventually delisted from the NPL and returned to a productive use.

I understand that Mr. Grisham has an open and ongoing dialogue with the EPA as a family intermediary on behalf of his father CC "Bud" Grisham, Sr., executor of the Mary F. Burke Grisham Estate that owns the land where the Arkwood site is located. I also understand that the Responsible Party for this site was formerly MMI and is now McKesson Corporation. As Shirley, Arkansas, is located in Congressman Griffin's district, I have informed his office that I am making this inquiry on behalf of their constituent and will keep them aware of any information related to this issue. Additionally, I am keeping other



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congressional and state offices I know Mr. Grisham has contacted aware of this inquiry. However, as the site is in the Third Congressional District of Arkansas and Boone County – and its residents – would benefit from the resolution of this issue, I am making this inquiry on behalf of Congressman Steve Womack.

As I understand it in very broad terms, EPA's involvement with Arkwood began in the 1980's. Since that time, it appears that soil remediation was conducted and completed in the 90's but ground water contingency remedy is ongoing. Here are the initial questions I have:

- The Superfund Information Systems EPA Superfund Site Progress Profile for Arkwood indicates the following, and I would like this information confirmed:
 - Current human exposures at this site are under control.
 - Contaminated ground water migration is under control.
 - Physical cleanup activities have been completed, with construction complete on June 28, 1996.
 - The only major site cleanup milestone not yet reached is deletion from the NPL.
 - EPA has determined that the Arkwood site meets the criteria for Site-wide Ready for Anticipated Use, meaning that all cleanup goals have been achieved for both current and reasonably anticipated future land use.
- I understand that Arkwood has a Site Score of 28.95 on the Hazard Ranking System that considers ground water migration, surface water migration, soil exposure and air migration. I also understand that the minimum site score to be listed on the NPL is 28.50. Having reviewed the current list of 1,320 Final NPL sites, I see that Arkwood is among the 1.8% of sites nationally that are within a half-point of the cut-off for listing on the NPL. Additionally, I find that the Arkwood site has the lowest Site Score for all Final NPL sites currently in EPA Region 6. While I know the Site Score is a screening tool and not a site specific risk assessment, it is the primary criterion EPA uses to determine whether a site should be placed on the NPL in the first place. As the site barely surpasses the HRS score threshold for NPL consideration, it would seem to me – from a layman's perspective – that Arkwood would be low-hanging fruit in terms of seeing the cleanup process through to deletion from the NPL. However, nearly 25 years have transpired since Arkwood was listed as final on March 31, 1989. Recognizing that much work has transpired in the interim, I would like to know:
 - Where is this site in the clean-up process in terms of meeting the requirements for deletion from the NPL?
 - What steps must be taken to complete the clean-up process and delete Arkwood from the NPL?
 - What is the expected/anticipated/estimated time it will take to reach the goal of completion of the clean-up process so a decision can be made for the site to be deleted from NPL?
 - What – if any – factors in this case have, or continue to, present obstacles to reaching a conclusion in the clean-up progress and deletion from the NPL?
 - § Mr. Grisham has expressed concerns about apparent differences between EPA and ADEQ regarding the remedial goal for PCP levels. Are the proper standards/criteria/screening levels being applied?
 - § Mr. Grisham mentioned that concerns regarding dioxin levels recently developed due not to a change at that site but an EPA reassessment of dioxin toxicity. How does this factor into the clean-up progress?
 - § Are there any other chemicals present on site that present a concern?
 - What efforts are being made to accelerate/expedite this cleanup to reach the point of

deletion from the NPL?

- Mr. Grisham has cited a letter from the late 1980's that indicated at that time an expectation existed for the completion of this process to be relatively quick. In a letter dated Nov. 4, 1989, the then director of the EPA Region 6 Superfund Division stated to the Boone County judge that "However, cleanup of the groundwater New Cricket Spring, is anticipated soon. As soon as this happens EPA plans to delist the site from the NPL and return it to productive use."
 - What changed from that time to postpone the expressed optimism of the outcome, still unrealized to this day?
 - What is the timeframe for Arkwood's return to productive use?
- As the primary focus of my inquiry relates to deletion from the NPL (with return to a productive use so the site can become an economic development opportunity a close second) I request that any information pertaining to the process not addressed by my questions be explained so I have a clear understanding of what is involved to bring Arkwood to that point.

I look forward to hearing from the EPA regarding the Arkwood site in response to this inquiry.

Thank you.

Kyle Weaver*Projects Director*
Congressman Steve Womack, AR-3

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